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06/03/2015

By ECFThe Hon. Judge Joseph F. Bianco
United States District Court
Eastern District of New York
Long Island Federal Courthouse
100 Federal Plaza
Central Islip, NY 11722-9014**RE:** Jennifer Rodriguez vs. 21st Century Cosmetic Dental Lung Chao DS,
P.C. Case # 13-CV-06806

Dear Judge Bianco:

I refer this letter to your attention due to the presence of language in the prior scheduling order referring to a pretrial order. According to the rules of Magistrate Shields, extensions of time concerning pretrial orders must be made to the District Judge.

Defendant makes this bilateral request to extend the deadlines detailed in the scheduling order of March 25, 2015. Both parties have conferred regarding this request and consented to the proposed adjournment. On May 14, 2015, both parties held a telephone conference regarding this matter with the chambers of Magistrate Shields and an extension of discovery deadlines was discussed. At that time it was agreed that further depositions would warrant an extension of time, and the extension could be sought once timelines for the depositions had been agreed upon.

At this point it appears that all depositions will be completed by Monday June 22, 2015.

There have been two prior requests for adjournment or extension of these deadlines.

The Original deadlines are as follows:

- The deadline to complete discovery, inclusive of expert discovery, is extended from March 11, 2015 to May 15, 2015.
- The deadline for taking the first step in the dispositive motion process is extended from March 25, 2015 to June 8, 2015.
- The pretrial conference scheduled for April 15, 2015 is adjourned to June 16, 2015 and will be held in Courtroom 830 at 11:00 A.M. A joint pretrial order in compliance with the District Judge's requirements must be electronically filed prior to the June 16, 2015 conference.

The proposed amended scheduling order is as follows:

- The deadline to complete discovery, inclusive of expert discovery, is extended from May 15, 2015 to June 22, 2015.
- The deadline for taking the first step in the dispositive motion process is extended from June 8, 2015 to July 13, 2015.
- The pretrial conference scheduled for June 16, 2015 is adjourned to July 21, 2015; or July 28, 2015; or August 4, 2015, and will be held in Courtroom 830 at 11:00 A.M. A joint pretrial order in compliance with the District Judge's requirements must be electronically filed prior to this conference.

We are thankful for the Court's consideration

Respectfully Submitted,

_____/s/_____
Daniel Grace